DRAZIN and WARSHAW, P.C. 25 Reckless Place P. O. Box 8909 Red Bank, New Jersey 07701 (732) 747-3730 Attorneys for Defendants Capital Assets Property Management & Investment Co., Inc.; Capital Assets Property Management & Investment Co., L.L.C.; and Gary Grieser

WALSH SECURITIES, INC.

Plaintiff,

-vs-

RR 6813

CRISTO PROPERTY MANAGEMENT LTD, a/k/a G.L.J. LIMITED, DEK HOMES: OF NEW JERSEY, INC., OAKWOOD PROPERTIES, INC., NATIONAL HOME FUNDING, INC., CAPITAL ASSETS PROPERTY MANAGEMENT & I NVESTMENT CO., INC., CAPITAL ASSETS PROPERTY MANAGEMENT &: INVESTMENT CO., L.L.C., WILLIAM J. : KANE, GARY GRIESER, ROBERT SKOWRENSKI, II, RICHARD CALANNI, : RICHARD DI BENEDETTO, JAMES R. BROWN, THOMAS BRODO, RONALD J.: PIERSON, STANLEY YACKER, ESQ., MICHAEL ALFIERI, ESQ., RICHARD PEPSNY, ESQ., ANTHONY M. CICALESE, ESQ., LAWRENCE M.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

CIVIL ACTION NO. CV 97-3496 (WJB)

ANSWER TO CROSS-CLAIM OF **DEFENDANTS ANTHONY D'APOLITO** and DAP CONSULTING, INC.

CUZZI, ANTHONY D'APOLITO, DAP CONSULTING, INC., COMMONWEALTH LAND TITLE INSURANCE COMPANY, NATIONS TITLE INSURANCE OF NEW YORK, INC., FIDELITY NATIONAL TITLE INSURANCE COMPANY OF NEW YORK and COASTAL TITLE AGENCY,

Defendants,

Defendants, Capital Assets Property Management & Investment Co., Inc., Capital

Assets Property Management & Investment Co., L.L.C., and Gary Grieser, having their principal

place of business at 10 West Bergen Place, Red Bank, in the Borough of Red Bank, County of

Monmouth, State of New Jersey, by way of answer to the Cross-Claim of Defendants Anthony

D'Apolito and DAP Consulting, Inc., say:

1. These defendants deny the allegations of the Cross-Claim.

DRAZIN & WARSHAW, P.C. Attorneys for Defendants Capital Assets Property Management & Investment Co., Inc. Capital Assets Property Management & Investment Co., L.L.C. and Gary Grieser

Dated: January 6, 1998

Ronald Lee Reisner

For the Firm

DRAZIN and WARSHAW, P.C. 25 Reckless Place P. O. Box 8909 Red Bank, New Jersey 07701 (732) 747-3730 Attorneys for Defendants Capital Assets Property Management & Investment Co., Inc.; Capital Assets Property Management & Investment Co., L.L.C.; and Gary Grieser RR 6813

WALSH SECURITIES, INC.

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW JERSEY

Plaintiff,

CIVIL ACTION NO. CV 97-3496 (WJB)

-VS-

CRISTO PROPERTY MANAGEMENT

LTD., etc., et als;

CERTIFICATION OF SERVICE

Defendants.

I hereby certify that on the date hereof, I caused a true copy of the within Answer to Cross-Claim of Defendants, D'Apolito and DAP Consulting, Inc. be served by regular mail upon Richard A. Finkel, Esq., Meissner, Kleinberg & Finkel, attorney for defendants, Cristo and Kane at 275 Madison Ave., Suite 1000, New York, N.Y. 10016; Richard L. Friedman, Esq., Giordano, Halleran & Ciesla, P.C., attorneys for defendant Alfieri, at P. O. Box 190, 125 Half Mile Road, Middletown, NJ 07748; Mark W. Catanzaro, Esq., attorney for defendant, Pepsny.

at 513 South Lenola Road, Moorestown, N.J. 08057; Todd Panjonas, Esq., attorney for defendants Nations Title and Fidelity National Title at 2 Park Avenue, Suite 1420, New York, N.Y. 10016, August W. Fischer, Esq., attorney for defendant Calanni, at 53 Pequot Road, Ringwood, N.J. 07456, Michael Chertoff, Esq., Latham & Watkins, attorneys for plaintiff, Walsh Securities, Inc., at One Newark Center, 16th Floor, Newark, NJ 07101-3174; Lawrence S. Lustberg, Esq., Crummy, Del Deo, Dolan, Griffinger & Vecchione, P.C., attorneys for defendant Yacker at One Riverfront Plaza, Newark, NJ 07102-5497; David Kott, Esq., McCarter & English, attorneys for defendant Commonwealth Land Title Insurance Company at Gateway Four, Newark, NJ 07102; Charles J. Uliano, Esq., Chamlin, Rosen & Uliano, attorneys for defendant D'Appolito and Dap Consulting at 268 Norwood Ave., P. O. Box 38, West Long Branch, NJ 07764; and Michael D. Schottland, Esq. for defendants National Home Funding, Inc. and Skowrenski at 36 West Main Street, Freehold, NJ 07728.

DRAZIN & WARSHAW, P.C. Attorneys for Defendants Capital Assets Property Management & Investment Co., Inc., Capital Assets Property Management & Investment Co., L.L.C. and Gary Grieser

Dated: January 6, 1998

Ronald Lee Reisner